

## **APPENDIX C**

### **COMMENTS RECEIVED POST SCOPING COMMENT PERIOD**

## ***APPENDIX C COMMENTS RECEIVED POST SCOPING COMMENT PERIOD***

Comments received after November 26, 2003 are not summarized in the scoping report, but are included in this appendix. The BLM will work to ensure that these late comments are incorporated in the next phase of the RMP revision process to the extent possible. Table C-1 includes an alphabetical directory of commentors by last name. An identification number was assigned to each comment letter and is located in the upper left corner. All comments are organized numerically according to the comment number following this table.

**Table C-1. Alphabetical Directory**

<b>Commentor Last Name</b>	<b>Commentor First Name</b>	<b>Agency/Organization Name</b>	<b>Comment Letter Date</b>	<b>Comment Letter Number</b>
Esterholdt	Erick		12/10/2003	KSL-0057
Lewis	Mike	South Lincoln Youth Association	12/12/2003	KSL-0055
McGinnis	David	National Park Service	12/9/2003	KSL-0059
McPhie	Mark	South Lincoln Youth Association	12/12/2003	KSL-0055
Nicotera	Jami	South Lincoln Youth Association	12/12/2003	KSL-0055
Nicotera	Kevin	South Lincoln Youth Association	12/12/2003	KSL-0055
Roberts	Fred		12/10/2003	KSL-0058
Svoboda	Larry	United States Environmental Protection Agency	12/23/2003	KSL-0060
Teichert	John		12/2/2003	KSL-0056



**Written Comment Form**  
**Kemmerer Field Office Planning Area**  
**Resource Management Plan (RMP) Revision Process**



Location: \_\_\_\_\_

Date: 12-12-03

Thank you for your input.

**PLEASE PRINT LEGIBLY.**

South Lincoln Youth Assoc. is Requesting an adjacent lot to the Lincoln County Landfill. Section 31 and 32, T.S. 21 N R.115 West. This land is the closest Section of BLM property that would allow easy access to this property. If this area is found unsuitable due to winter range for Antelope then Section 28, T.S. 21 North Range 115 West is also an Ideal location. This non-profit youth organization is currently working with Lincoln County Commissioners in an attempt to secure a location for under aged youth to safely ride equipment & vehicles. Local regulations have sent our youth riding in undesirable locations on BLM County State land, which could result in someone injured difficult to get to while riding through private property. Our group is meeting with the commissioners for the third time on December 10th 2003. Our group is currently looking into insurance and liability waivers for members. Having most of the local off road vehicles (ORV) recommended to ride in a scheduled non-populated area by Kemmerer landfill will promote responsible riding and give a great reference location for the riders that are ask to leave certain areas. At this time there is not an operating designated riding area. New trails are sprouting up all over Southern Lincoln County and regulations are constantly changing. Our kids need a safe place to ride that has both technical track availability and desert riding. An open-ride land area in connection with a designated youth project provides different riding preferences, safe & structured riding, membership at track can promote safety with annual sign up. Our Board contends the BLM for keeping a watchful eye on our land. Thank you.

\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Kemmerer Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

NAME:	Jami Nicotria
ORGANIZATION:	South Lincoln Youth Association
ADDRESS:	417 Beech Ave
CITY/STATE/ZIP:	Kemmerer, Wyoming 83101

- ☐ Yes, include my name and address on the mailing list so I can receive information on the Kemmerer Planning Area RMP Revision.
- ☐ No, do not include my name and address on the mailing list.

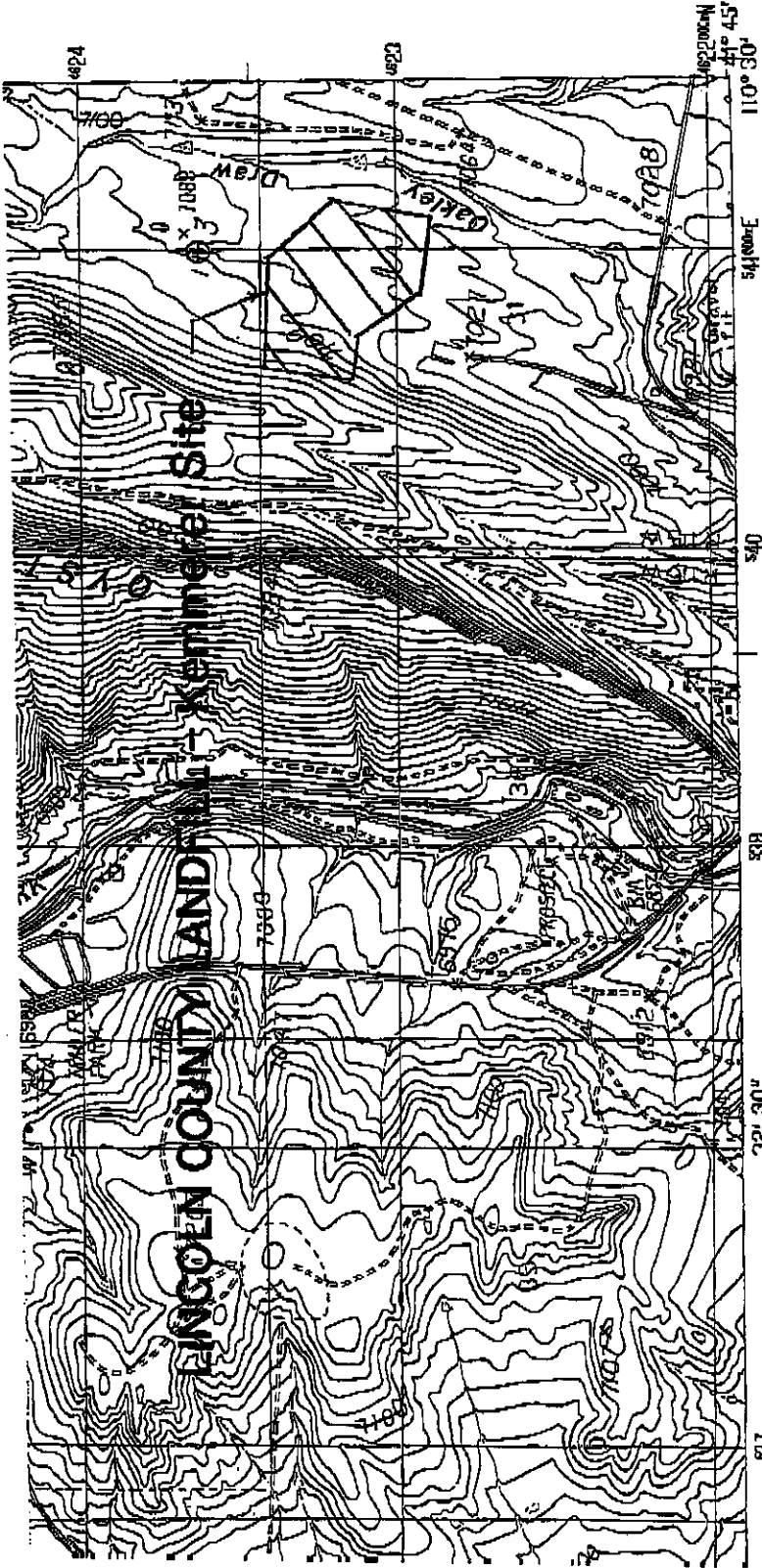
Please hand this form in or MAIL (post-marked by November 26, 2003) to:

2003 DEC 12 PM 3:35

RECEIVED  
BLM KEMMERER F.O.

BLM Kemmerer Field Office  
 312 Highway 189 North  
 Kemmerer, Wyoming 83101  
 Attn: RMP Revision

RECEIVED  
BLN KEMMERER F.O.  
2003 DEC 12 PM 3:35



INTERIOR-GEOLOGICAL SURVEY, RESTON, VIRGINIA - 1948

ROAD LEGEND

- Improved Road  
Unimproved Road  
Trail
- Interstate Route U.S. Route State Route

QUADRANGLE LOCATION

1	2	3
4	5	6
7	8	9

ADJOINING 7.5' QUADRANGLE NAMES

FIGURE 11

KEMMERER, WYOMING  
PROVISIONAL EDITION 1985

41110-G5-TF-024

AP ACCURACY STANDARDS  
DENVER, COLORADO 80226  
ZA 22092



**Written Comment Form**  
**Kemmerer Field Office Planning Area**  
**Resource Management Plan (RMP) Revision Process**

Location: CokevilleDate: 12-2-2003

Thank you for your input.

PLEASE PRINT LEGIBLY.

- Some thought regarding Smith Fork allotment and proposed expansion of Wilderness Area (Just received form)
- (1) May I remind you that we have gone through 5 years of drought. One good year would make big difference.
  - (2) Raymond mt. is overstocked with wild life. Hunters for weeks on the Riparian Areas
  - (3) For 125 years ranches have been bought and sold on basis of the range rights and water rights <sup>that</sup> with their ranch. They made an investment in said lands. Most have been good stewards. They have developed water and made improvements.
  - (4) With fencing and range riders it make this range expensive. I'm glad I no longer have that worry. Hopefully my sons will only have Preacher Hollow to worry about. In taking 186 Acres off Smith <sup>Fork</sup> should help the other users.
  - (5) I know Darrel Short has an axe to grind and will say

\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*

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NAME:	<u>John A Teichert</u>
ORGANIZATION:	<u>Former User</u>
ADDRESS:	<u>Box 190</u>
CITY/STATE/ZIP:	<u>Cokeville, WY 83114</u>

- ☐ Yes, include my name and address on the mailing list so I can receive information on the Kemmerer Planning Area RMP Revision.
- ☐ No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 26, 2003) to:

BLM Kemmerer Field Office  
 312 Highway 189 North  
 Kemmerer, Wyoming 83101  
 Attn: RMP Revision

RECEIVED  
 BLM KEMMERER F.O.  
 2003 DEC -3 AM 9:18

never be satisfied John Marvel wants all livestock off Federal grounds. Both are dogs in the manger, but it seems the sheepy wheel gets the most grease.

While there may be some abuse

- (1) Numbers turned out need to be accounted for.
- (2) Pastures need to be fully rotated.
- (3) Always there <sup>are</sup> some cattle not gathered in. Sheep overstay their use period.
- (4) brush spraying or removal is needed
- (5) Water develop away from streams is needed.
- (6) Better handling by range riders is needed
- (7) Sheep number need to be cut as well as cows. and # Sheep to be kept off riparian areas.



**Written Comment Form**  
**Kemmerer Field Office Planning Area**  
**Resource Management Plan (RMP) Revision Process**



Location: \_\_\_\_\_

Date: 12-10-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

I never received the RMP till November 25-2003 - See Attachment  
for comments.

\*\*\* CONTINUE ON BACK FOR MORE SPACE \*\*\*

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Kemmerer Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

NAME: Irish W. Detenbeck

ORGANIZATION: \_\_\_\_\_

ADDRESS: POB 128CITY/STATE/ZIP: Lakeville WY 83114

- ☒ Yes, include my name and address on the mailing list so I can receive information on the Kemmerer Planning Area RMP Revision.
- ☐ No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 26, 2003) to:

BLM Kemmerer Field Office  
 312 Highway 189 North  
 Kemmerer, Wyoming 83101  
 Attn: RMP Revision

RECEIVED  
 KEMMERER F.O.  
 NOV 15 AM 9:43

**Comments for the BLM Kemmerer RMP Revision Process**

12/10/2003

**2.16 Special Management Areas:**

**Issues on the Raymond Mountain WSA.**

1. Raymond Creek consideration to be designated as a Wild and Scenic River. Having lived all my life and familiar with this area and particular creek, I find it interesting that this small creek would be considered to be a Wild & Scenic River. This creek is so small it does not normally ever reach Navigable Waters. The only time it ever reaches the Thomas Fork is in a One in Thirty Year Flood Event. Raymond Creek runs exclusively into our ranch that is located below Raymond Canyon. It has such a low flow rate it can barely supply stock water in the winter time. In the last 3 Drought years it has frozen solid and I would be surprised if any fish has survived. This Creek certainly meets the intermittent criteria and is unsuitable for fisheries. I have read the Wyo G&FD reports on the BRC that are supposed to be in this creek. This creek is not a fishery as some would like to believe. Poor Judgment could be the only reason to consider this marginal Creek (SPRING) be considered for this designation. The Wild & Scenic River Designation is nothing more than the erosion of Private Property Rights.

Grazing, Mining, and Mineral Leasing uses that existed on Oct 21 1976 may continue in the same manner and degree as on that date, even if this would impair wilderness suitability of the WSAs. Valid and existing rights must be recognized.

This is Under 2.16.2 in RMP. If this is the case the Grazing Permittes should not have taken any cuts in AUMs and all cuts should be reinstated immediately.

2. Huff Creek also has low flow rates and freezes in the winter months. This would also qualify it as a intermittent creek and should not be designated as a Wild & Scenic River.

**2.12 Rangeland Management:**

1. Coordination with WGFD on herd objective numbers. These herd numbers should be restored back to 1976 Grazing numbers and should take the same proportional cuts that the livestock Permittes have taken since that time. Any increase of this objective number should be trespassed and fined just as the Permittes have been. Big Game Animals should be restricted from Riparian Areas just as Livestock are.
2. Big Game Herds should have a Brucellosis Vaccination Program so they will not spread this disease to the Livestock. If the WFGD want these herds maybe they should try to manage them like everyone else.
3. BLM needs to better Manage Sage Brush and create more water sources off the Riparian Areas. This will allow the Wildlife and livestock to have more forage and not have to go to the Riparian Areas to water.

Erick W. Esterholdt

*Erick W Esterholdt*

2003 DEC 15 AM 9:48  
BLM KEMMERER  
RECEIVED



December 10, 2003

Bureau of Land Management  
Kemmerer Field Office  
Kemmerer, Wyoming 83101

To Whom It May Concern:

I submit the following comments regarding the MSA of the Kemmerer Field Office.

2.3.2

This paragraph states that prescribed fire has been utilized successfully in the Kemmerer District for the past twelve years. Yet there has never been a prescribed burn in the Smith's Fork Allotment during that time frame, or any vegetative treatments.

2.3.3

Not only should livestock grazing be considered post-burn, but also wildlife numbers should be considered, especially objective numbers for each class of wildlife.

2.16.4

Another opportunity should be the withdrawal of the WSA designation. Without dealing with the bureaucratic nightmare associated the WSA designation, more water development and vegetative treatments could be completed to enhance grazing and wildlife habitat. At a minimum, the Raymond Mountain WSA should not be considered for any expansion.

2.17.4.1

The white-tailed prairie dog ACEC petition should not be considered.

2.18.4

Areas should be identified that have potential to be closed to most public access through private property due to conflicts with the BLM or the Wyoming Game and Fish.

General Comments:

The stock trails in the Kemmerer District should be maintained. The trails provide a valuable means for the movement of livestock from winter allotments to spring and summer allotments, and for the return to the winter allotments. Trucking of livestock in and out of many allotments in the Kemmerer District is impossible due to road conditions and weather. The trails are historic and should be left in place.

Water development in the Smith's Fork has been very slow coming. One can't maintain or improve riparian areas without the availability of another location for livestock and wildlife to get water. Likewise, livestock permittees and the Game and Fish have requested vegetative treatments or at least a treatment plan since 1995. To date, nothing has been done. The tall brush communities are basically taking over the grass opportunities for wildlife and livestock.

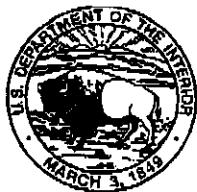
Thank you for your consideration of the above comments.

Sincerely,



Fred Roberts

2003 DEC 15 AM 9:50  
BLM KEMMERER F.O.  
RECEIVED



IN REPLY REFER TO:

## United States Department of the Interior



## NATIONAL PARK SERVICE

Fossil Butte National Monument

P.O. Box 592

Kemmerer, Wyoming 83101

A3815

December 9, 2003

To: Area Manager, Bureau of Land Management, Kemmerer Resource Area

From: Superintendent, Fossil Butte National Monument

Subject: Resource Management Plan Revision

Enclosed are comments from Fossil Butte National Monument. These comments are directed toward six topics in the RMP revision.

Thank you for the opportunity to review and comment on the revision. Please call us if you have any questions.

David McGinnis  
307-877-4455

OPTIONAL FORM 99 (7-90)

## FAX TRANSMITTAL

# of pages

3

To	CHRISTA	From	Don
Dept./Agency	SAIC	Phone #	307.828.4543
Fax #	208.344.5123	Fax #	

NSN 7540-01-217-7368

5099-101

GENERAL SERVICES ADMINISTRATION

RECEIVED  
BLM KEMMERER F.O.  
2003 DEC -9 PM 4:07

**Comments on the BLM Kemmerer Resource Management Plan Revision  
from Fossil Butte National Monument  
December 9, 2003**

**1. Management of paleontological resources for science and educational purposes.**

Many fossil localities on BLM Kemmerer Resource Area lands are unique and valuable sites for scientific study and public education. We feel the Plan should address preservation and study of these localities since they comprise the majority of the best-preserved Eocene Epoch paleoecosystem resources in the world. The small percentage of these resources from Fossil Lake found within Fossil Butte National Monument pale in comparison with the paleontological resources that occur on lands in the Kemmerer BLM Resource Area.

The Plan should provide some indication of how the BLM will collaborate with others. The primary mission of Fossil Butte National Monument and academic institutions responsible for paleo-resources is the need to study and compare fossil resources and paleogeographic sites on BLM and surrounding lands.

Fossil Basin paleontological resources within the BLM Kemmerer Resource Area have potential for World Heritage Area listing under several scientific and educational authorities and criteria. Consideration may be warranted for a Scientific Study Area or Area of Critical Environmental Concern status due to the unique scientific and educational values of these resources. At minimum, there should be a strategy for cooperative study and educational management of these fossil and geologic resources. A Fossil Basin-wide inventory of paleontological resources in the Resource Area is critical for proper management.

When Fossil Butte National Monument was established by Congress there was an understanding (documented in congressional testimony) that many of the surrounding complementary and scientifically unique BLM components of the fossil assemblage of Fossil Basin would be preserved forever. Size of the monument was predicated on BLM fossil resources remaining available for scientific and public educational purposes as part of the BLM protective umbrella of multiple uses. A joint paleontologic inventory with Fossil Butte NM could provide the BLM with data necessary to manage and protect their paleontological resources and permit the monument to manage their resources in proper context.

**2. Management of species adapted to and dependent on mature sagebrush dominated environments.**

Use of fire and management of sagebrush-dominated rangelands for multiple uses may not adequately provide for populations of wildlife critically dependent upon interconnected ecosystems dominated by mature stands of sagebrush. Pygmy rabbits, sage grouse, and other species have been on the decline for many years, perhaps in part due to a livestock grazing management focus of the BLM. The new RMP revision has an opportunity to look closely at ways to implement new management strategies to insure adequate lands exist with interconnected, mature sagebrush communities so that fragmentation does not isolate and further fragment some of the indicator species we are losing throughout the west.

The plan should address habitat protection and management for non-game species, unique plant communities, and other plant and animal species that have been identified as rare, endangered, or species of "special concern."

**3. Allocation of forage for wildlife.**

The National Park Service appreciates the fact that the BLM will address the topic of wildlife forage. When the 8,198-acre Fossil Butte pasture was removed from BLM grazing rotation in 1989 wintering elk numbers increased from a few dozen to 300 or more head during the winter of 2002. There is concern that vegetation within the boundary of the monument may be damaged by foraging elk unless the surrounding public land is managed to provide more winter forage for elk and other wild ungulate populations.

RECEIVED F.O.  
BLM KEMMERER R.O.  
2003 DEC -9 PM 4:07

#### **4. Water Resource Management.**

In the past, many natural hydrological systems on public lands throughout the west were damaged, interrupted, or manipulated by various land uses such as the installation of rights-of-ways, utilities, agricultural activities and grazing, road construction, and mineral development. Correcting erosion problems associated with old water projects can be expensive, long-term in scope, and difficult to accomplish. Many times such problems require strong cooperative efforts between multiple private landowners, corporations, and federal, state, county, and local governments. Without collaborative efforts, restoration is difficult to achieve and erosion is impossible to overcome.

What will the RMP revision say about comprehensive collaborative efforts to protect springs, seeps, and other natural hydrological systems from further deterioration? The RMP revision should address the restoration of streams affected by headwall erosion, gulying, and depleted riparian vegetation and habitat especially where stream reaches cross ownership boundaries.

#### **5. Cooperative Relationships to protect vanishing landscape vista and historic settings for cultural resources.**

The NPS appreciates the fact that the BLM will address the protection of National Historic Trails and their viewsheds in the RMP. What cooperative efforts will the BLM employ to protect other historic and cultural landscapes within the Kemmerer Resource Area that merit protection for their educational and aesthetic value? In particular, we suggest that the viewshed from Fossil Butte National Monument be accorded a high level of protection from all vantage points.

#### **6. Management of exotic species.**

The NPS is pleased that the BLM will address "weed problems" in the RMP revision. The significance of the problem is demonstrated by the rapid spread of whitetop (*Cardaria* spp.) along the Little Muddy and its tributaries in recent years. Many other invasive exotic plants (e.g. musk thistle, bull thistle, Canada thistle, toadflax, and knapweeds) occur throughout the Kemmerer Resource Area. The NPS would like to see the BLM adopt aggressive land management policies regarding the identification, location, control, and monitoring of invasive exotic weed populations.

The BLM should also consider incorporating management practices into the RMP that will prevent or hinder the establishment and spread of other types of exotic species. White pine blister rust, West Nile virus, chronic wasting and whirling disease and brucellosis are problematic in southwest Wyoming and indicate the need for agency management practices to rehabilitate resource areas becoming infected. Your plan says it will address the requirement for wash-down (decontamination) of fire fighting equipment to prevent the spread of exotics. Why not include the same requirement to decontaminate for exotics by wash-down of oil and gas field equipment coming into the area.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 8  
999 18<sup>TH</sup> STREET - SUITE 300  
DENVER, CO 80202-2466  
Phone 800-227-8917  
<http://www.epa.gov/region08>

DEC 23 2003

Ref: 8EPR-N

Don Ogaard  
Bureau of Land Management  
Kemmerer Field Office  
312 Highway 189 North  
Kemmerer, Wyoming 83101-9711

RECEIVED  
BLM KEMMERER F.O.  
2003 DEC 29 AM 8:16

RE: Scoping Comments for Kemmerer Resource  
Management Plan and Environmental  
Impact Statement

Dear Mr. Ogaard:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. seq., and Section 309 of the Clean Air Act, the Region 8 office of the Environmental Protection Agency (EPA) is submitting scoping comments for the Kemmerer Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

The October 27, 2003 scoping letter has already identified many good issues on which to focus. The following general comment areas are issues that EPA has an interest in and would like to work with BLM prior to the issuing of a draft EIS for this planning process. More importantly, our experiences with other planning projects and related EIS efforts show that working with BLM prior to issuing a draft EIS allows for more time to work on difficult issues prior to time constraints posed by draft EIS comment periods.

We are currently evaluating our ability to participate in this action as a formal cooperating agency. As you probably know, EPA's time resources and travel budget for the NEPA program are very limited. By either scheduling meetings as conference calls when appropriate or holding meetings in Cheyenne, BLM would reduce EPA's time needed for travel to meetings and eliminate the need for hotel rooms for travel to Cheyenne. This may also improve participation by State of Wyoming environmental programs and other agencies such as Fish and Wildlife Services.

**General Comments**

EPA has identified in past and current BLM projects and Resource Management Plans (RMPs) the importance of good air and water quality analysis for NEPA documents. We continue to encourage Wyoming BLM to accompany good planning with good NEPA analysis and the avoidance or mitigation of direct and cumulative impacts.



Under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, EPA has the responsibility to review and comment on the environmental impact of major federal actions to which NEPA applies. Consistent with these responsibilities, EPA will review the Kemmerer RMP revision documents to ensure that air quality issues are adequately addressed. BLM should take into account what air quality impacts are likely, consistent with appropriate guidance.

Since a Reasonable Foreseeable Development (RFD) scenario has not yet been developed for the planning area, EPA will need additional information before we can make informed comments on the impact of current projects or future projects on surface water or ground water quality.

EPA would also encourage the RFD for the Kemmerer planning area to anticipate the potential for development within the planning area. It is appropriate to project past development for coal, oil and gas, and other mining for the life of the RMP. An RFD that only includes current projects or projects that are currently under NEPA analysis is not a reasonable prediction for a planning document such as an RMP. The planning and NEPA analysis must evaluate actions and impacts for the life of the planning document. Although exact locations of wells or mine boundaries may not be possible in an RMP planning process, enough data exists to predict potential for development within basins. Data that exists in the Wyoming Oil and Gas Resource Assessment (WOGRA) should be helpful in locating areas of potential development and possibly projecting general levels of activity for mining and oil and gas development.

Although the Kemmerer Planning area is not anticipating large increases in the number of wells compared to other adjacent planning areas, there are important issues that should be analyzed in the EIS, such as reducing habitat losses by conserving areas of crucial winter range and adopting the State of Wyoming's sage grouse conservation plan.

### **Scoping Comments Specific to the Kemmerer Resource Management Plan**

#### **Air Quality**

The Kemmerer Management Situation Analysis (MSA) anticipates 1,200 future oil and gas wells (including approximately 200 coalbed gas wells) within the next 20 years. Although this is not a large number of new wells compared to BLM's other Wyoming planning areas, the RMP should include an air quality assessment that documents current air quality conditions, using suitable data sets from ambient air monitoring programs. This assessment should consider the cumulative impact of development increases anticipated in the Pinedale and Rawlins RMP efforts as well as potential development on neighboring Forest Service lands, such as the overthrust area in western Idaho. Other issues that should be considered include air quality related values such as visibility, ozone, and deposition in the Class I areas nearby to the planning area (Grand Teton National Park and Bridger Wilderness Area).

EPA suggests that the Kemmerer Field Office review recent air quality and visibility analysis that has been completed by other agencies for the Southwest Wyoming area, such as the Southwest Wyoming Technical Air Forum (SWWTAF) modeling study and the Wyoming Department of Environmental Quality's May 29, 2003 Long Term Strategy for Visibility

Protection Review Report. EPA can provide information on these modeling activities if requested.

Although potential infill expansion will not impact habitat as much as developing new fields, additional compression requirements for infill would impact air quality.

Air quality concerns in southwest Wyoming have long been of concern for EPA and Wyoming Department of Environmental Quality. EPA suggests that BLM coordinate air quality analysis for the EIS with meetings between EPA, Wyoming DEQ and BLM as early as possible and prior to drafting the EIS.

### Wildlife

The MSA lists the Wyoming Greater Sage-Grouse as one of 22 sensitive species. The State of Wyoming has published a final Greater Sage-Grouse Conservation Plan dated June 24, 2003. The RMP should incorporate the goals and recommended management practices outlined in the Conservation Plan. Impacts to the sage grouse that could stem from BLM activities include: oil and gas development, dispersed recreation, and vegetation management. BLM should also be coordinating and participating with local conservation groups and the State of Wyoming to assist with research needs.

BLM should take advantage of opportunities to improve habitat if some older field developments are being reclaimed.

### Grazing

The DEIS should disclose how grazing historically has affected soils, water tables, vegetation, erosion, and streams and riparian areas. We understand the goal of the Taylor Grazing Act and numerous Federal statutes that have followed is to rehabilitate rangelands in the United States. Rehabilitation can be accomplished partly through controlling the numbers of livestock, protecting riparian areas (fencing and off-stream stock watering), rotating animal herds, and so forth. After describing historic rangeland condition, please compare current conditions to past baseline conditions (pre-settlement condition and/or earlier, more degraded conditions) to evaluate how rangeland management practices have affected resources and to prescribe future management options and evaluations.

### Oil and Gas

The MSA anticipates that there will be 1,200 future oil and gas production wells (including approximately 200 coalbed gas wells) in the Kemmerer Planning Area within the next 20 years. Even though this may not be a large increase of wells over current levels, the production volume may be large with additional compression requirements. The RMP should anticipate additional compression needs, if any, for the planning area.

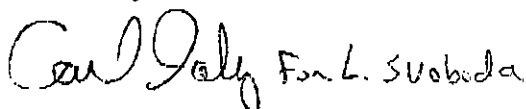
Wetlands

Executive Order 11990 requires Federal agencies to protect jurisdictional and non-jurisdictional wetlands. The DEIS should describe existing wetlands; their acreage, type, and ecological role; and how both acreage and function will be protected. Road construction and vegetation clearing, livestock grazing, and other disturbances may result in hydrologic impacts. These activities can promote changes to surface and subsurface drainage patterns that can ultimately lead to changes in wetland integrity and function. To comply with the CWA 404(b)(1) Guidelines, a thorough analysis of all possible alternatives to avoid and minimize wetland and aquatic resource habitat impacts should be addressed through the NEPA process.

The goals for establishing proper functioning condition (PFC) for wetlands should be identified in the the RMP and EIS. Currently 6% of the stream/river wetlands and 3% of the lake/reservoir/pond wetlands within the planning area are non functional. As stated in the MSA, wetlands in the planning area are not large but are critical to habitat for many species. Wetlands also provide other amenities such as water quality improvement and flood control. Therefore, EPA encourages BLM to provide alternatives that will avoid impacts to wetland areas and significantly improve the condition of the wetlands in the planning area.

Thank you for the opportunity to participate in this planning process. Carl Daly is the NEPA program contact and can be reached at (303)-312-6416. Joe Delwiche is the Air Program contact for NEPA documents and he can be reached at (303)-312-6448.

Sincerely,



Larry Svoboda, Director  
NEPA Program  
Office of Ecosystems Protection and Remediation

cc: Bill Daniels, BLM - Cheyenne